

LOCAL BANKRUPTCY FORM 5071-1
IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE, DISTRICT OF PENNSYLVANIA

IN RE: Daniel J. Baer a/k/a Baer's Buses, Grocery
& Repair
Debtor.

Carrington Mortgage Services, LLC as servicer
for Wells Fargo Bank, N.A., as Trustee for
Carrington Mortgage Loan Trust, Series 2007-
RFC1, Asset-Backed Pass-Through Certificates
Plaintiff(s)/Movant(s)

vs.

Daniel J. Baer a/k/a Baer's Buses, Grocery &
Repair
Debtor/Respondent

CHAPTER 13

BANKRUPTCY NO. 17-00913/RNO

ADVERSARY NO. ____ - ____ -ap- ____
(If applicable)

Nature of Proceeding: Motion for Relief

Pleading: Motion for Relief

Document # 70 and 92

REQUEST TO CONTINUE HEARING/TRIAL WITH CONCURRENCE

This request must be filed at least twenty-four (24) hours prior to the hearing. All requests must be approved by the Court. Submitting a request is not an automatic continuance.

The undersigned hereby requests a continuance with the concurrence of the opposing party (parties). This is a first request for a continuance².
Reason for the continuance.

Please continue the MFR hearing until November 1, 2017 so that this matter can be heard at the same time as the Confirmation hearing.

Contemporaneous with the filing of this request, the undersigned has served a copy of this request upon all counsel participating in this proceeding.

Respectfully submitted,

Dated: October 6, 2017

S&D File #:15-051512

BY: /s/ Kevin S. Frankel

Kevin S. Frankel, Esquire
Shapiro & DeNardo, LLC
3600 Horizon Drive, Suite 150
King of Prussia, PA 19406
(610)278-6800/ fax (847) 954-4809
PA BAR ID #318323
pabk@logs.com